

Allowable Milk Substitutes for Children without Disabilities in the Child and Adult Care Food Program

The requirements in this document apply only to milk substitutes for children whose dietary needs do not constitute a disability. Meal modifications for children with a disability that restricts their diet must follow the federal nondiscrimination laws and regulations. For more information, refer to the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Child Care Programs*.



Child care facilities (including child care centers, Head Start centers, at-risk afterschool care centers, emergency shelters, and family day care homes) that participate in the Child and Adult Care Food Program (CACFP) must follow the U.S. Department of Agriculture's (USDA) requirements for milk substitutes for children without a disability. These requirements apply only to meal modifications for children *without* a disability who cannot drink milk.

CACFP facilities have the option to offer one or more allowable fluid milk substitutes for children without a disability. If the CACFP facility chooses to make allowable milk substitutes available, they must be available for all children when requested by a parent or guardian. The USDA does not provide additional reimbursement for these substitutions.



Allowable Fluid Milk Substitutes

The USDA allows two types of milk substitutes for children whose dietary needs do not constitute a disability.

1. **Lactose-free or lactose-reduced milk** that meets the appropriate fat content for each age group. Lactose-free or lactose-reduced milk must be unflavored whole milk for age 1 and unflavored low-fat (1%) or fat-free milk for ages 2 and older. CACFP facilities may serve flavored fat-free milk to ages 6 and older, but the USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes. The USDA recommends that lactose-free or lactose-reduced milk is the first choice for children with lactose intolerance.
2. **Nondairy milk substitutes** that meet the USDA's nutrition standards for fluid milk substitutes (refer to table 1), such as certain brands of soy milk.

CACFP facilities may choose to offer only one milk substitute. If children decide not to take this option, the CACFP facility is not obligated to offer any other milk substitutes.

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USDA’s Nutrition Standards for Milk Substitutes

CACFP facilities that choose to offer a nondairy milk substitute for children without a disability must use products that meet the USDA’s nutrition standards for fluid milk substitutes (refer to table 1). Nondairy milk substitutes for ages 1-5 must be unflavored. CACFP facilities may serve flavored nondairy milk substitutes to ages 6 and older, but the USDA’s *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.

For children without a disability, reimbursable CACFP meals and snacks cannot contain nondairy beverages that do not comply with the USDA’s nutrition standards for fluid milk substitutes, even with a medical statement signed by a recognized medical authority. A noncompliant nondairy beverage cannot replace milk unless the child’s medically documented disability specifically requires it.

Table 1. USDA’s nutrition standards for fluid milk substitutes

Minimum nutrients per cup (8 fluid ounces)	
Calcium	276 milligrams (mg) or 30% Daily Value (DV) ¹
Protein	8 grams (g)
Vitamin A	500 international units (IU) or 10% DV
Vitamin D	100 IU or 25% DV
Magnesium	24 mg or 6% DV
Phosphorus	222 mg or 20% DV ¹
Potassium	349 mg or 10% DV ¹
Riboflavin	0.44 mg or 25% DV ¹
Vitamin B-12	1.1 micrograms (mcg) or 20% DV ¹

¹ The Food and Drug Administration (FDA) labeling laws require manufacturers to round nutrition values to the nearest 5 percent. The unrounded minimum DV is 27.6% for calcium, 22.2% for phosphorus, 9.97% for potassium, 25.88% for riboflavin, and 18.33% for vitamin B12. Source: *How to Determine if a Soy-Based Beverage Meets the Nutrient Requirements to Qualify as an Authorized Milk Substitute in WIC*, USDA Food and Nutrition Services (FNS) Office of Research, Nutrition, and Analysis (ORNA), 2006.

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Additional milk substitute requirements for child care programs in public schools

In addition to meeting the USDA's nutrition standards, nondairy milk substitutes served by child care programs located in public schools must meet the state beverage requirements of C.G.S. [Section 10-221q](#). Nondairy milk substitutes cannot contain artificial sweeteners and cannot contain exceed 4 grams of sugar per ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fat. [Table 2](#) lists products that meet the USDA and state requirements.

Identifying acceptable nondairy beverages

The Nutrition Facts label does not usually include all of the nutrients required to identify a product's compliance with the USDA's nutrition standards for fluid milk substitutes. If the Nutrition Facts label is missing any of the required nutrient information, CACFP facilities must contact the manufacturer to obtain a product specification sheet that documents the product's compliance with each of the nine nutrients (refer to [table 1](#)).

CACFP facilities can use the USDA's protein standard to screen nondairy products and determine if they might meet the USDA's nutrition standards. The USDA requires that fluid milk substitutes must contain 8 grams of protein per cup (8 fluid ounces). If the product's Nutrition Facts label lists less than 8 grams of protein per 1-cup serving, the product does not meet the USDA's nutrition standards.

If the product's Nutrition Facts label lists at least 8 grams of protein per 1-cup serving, the product *might* meet the USDA's nutrition standards. CACFP facilities must obtain additional information from the manufacturer to determine if the product also meets the standards for calcium, vitamin A, vitamin D, magnesium, phosphorus, potassium, riboflavin, and vitamin B12. CACFP facilities are encouraged to submit this information to the CSDE so that new acceptable products can be added to the list of approved products (refer to [table 2](#)).

Required Documentation

Nondairy milk substitutes for children without a disability do not require a medical statement from a recognized medical authority. Parents or guardians may request a nondairy milk substitute in writing. The written request must identify the medical or other special dietary need that restricts the child's diet and requires the substitution. Requests for milk substitutes must be maintained on file with children's medical records.

The provision allowing a written request from a parent or guardian applies only to nondairy milk substitutes for children without a disability. It does not apply to any other substitutions of foods or beverages in CACFP meals and snacks for children without a disability. For information on

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the requirements for meal modifications for children without a disability, refer to section 3 of the CSDE’s guide, *Accommodating Special Diets in CACFP Child Care Programs*.

Other Beverages

If a child’s dietary restriction is not related to a disability, CACFP facilities cannot substitute any other beverages for milk, even with a medical statement signed by a recognized medical authority. Examples of beverages that cannot be substituted for milk include:

- juice;
- water;
- milk substitutes that do not comply with the USDA’s nutrition standards for fluid milk substitutes, such as almond milk, rice milk, and cashew milk;
- nutrition supplement beverages, such as Abbott’s Pediasure; and
- powdered milk beverages, such as Nestle’s NIDO.



CACFP meals and snacks for children without a disability are not reimbursable if they contain any of these beverages in place of milk. If the CACFP facility chooses to make milk substitutes available, they must include at least one choice of either lactose-reduced or lactose-free milk, or an allowable nondairy beverage that meets the USDA’s nutrition standards for milk substitutes. These are the only two options allowed for milk substitutes for children without a disability.

Acceptable Milk Substitute Products

Certain brands of soy milk are the only nondairy milk products that currently meet the USDA’s nutrition standards for fluid milk substitutes. Almond milk, cashew milk, rice milk, oat milk, and other nondairy milk products do not meet these standards and cannot substitute for milk in the CACFP.

Not all brands of soy milk meet the USDA’s requirements. Before purchasing any type of soy milk, CACFP facilities should review products to make sure they comply with the USDA’s requirements.

[Table 2](#) provides a list of allowable milk substitute products. This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA. For milk substitutes not listed, CACFP facilities must obtain nutrition information from the manufacturer to document that the product contains the required amount of each nutrient in the USDA’s nutrition standards for milk substitutes (refer to [table 1](#)). The Nutrition Facts label might not

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include all of the nutrients required to identify a product’s compliance with the USDA nutrition standards. For assistance with evaluating products for compliance, please contact the CSDE.

Table 2. Milk substitutes meeting the USDA’s nutrition standards			
Unflavored milk substitutes (allowed for ages 1 and older)			
Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Original, aseptic package	8	Code 06183; UPC 0-41390-06183-7; Case (24 count) UPC 100-41390- 06183-4
Kirkland Signature	Organic Soymilk, Plain	64	0-96619-49000-4
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	8	0-52603-08311-9
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	32	0-52603-08200-6
Stremick’s Heritage Foods	8th Continent Soymilk, Original, refrigerated	64	0-53859-07066-3
Sunrich Naturals	Soymilk, Original, aseptic package ¹	8	7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package ¹	32	7-82758-33232-8
Walmart	Great Value Soymilk, Original, paper carton ¹	32	0-78742-09387-1
<p>¹ These beverages exceed the fat limit for nondairy milk substitutes required by Section 10-221q of the Connecticut General Statutes. They cannot be served as a milk substitute in CACFP child care programs located in public schools.</p>			

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Table 2. Milk substitutes meeting the USDA’s nutrition standards, *continued*

Flavored milk substitutes (allowed only for ages 6 and older) ^{1, 2}

Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8	Code 06185; UPC 0-41390-06185-1; Case (24 count) UPC 100-41390- 06185-8
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8	Code 06184; UPC 0-41390-06184-4; Case (24 count) UPC 100-41390- 06184-1
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Vanilla, aseptic package	32	0-52603-08225-9
Stremick’s Heritage Foods	8th Continent Soymilk, Vanilla, refrigerated	64	0-53859-07067-0
Sunrich Naturals	Soymilk, Unsweetened Vanilla, aseptic package ¹	32	7-82758-33932-7
Sunrich Naturals	Soymilk, Vanilla, aseptic package	32	7-82758-33132-1
Sunrich Naturals	Soymilk, Vanilla, aseptic package	8	7-82758-33208-3

¹ These beverages exceed the fat limit for nondairy milk substitutes required by [Section 10-221q](#) of the Connecticut General Statutes. They cannot be served as a milk substitute in CACFP child care programs located in public schools.

² CACFP facilities may serve flavored nondairy milk substitutes to ages 6 and older, but the USDA’s *CACFP Best Practices* recommends serving only unflavored milk substitutes.

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Resources

Accommodating Special Diets in CACFP Child Care Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/GuideSpecialDietsCACFP.pdf>

CACFP Best Practices (USDA):

https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_factBP.pdf

CACFP Meal Patterns for Children (USDA):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/CACFPmealpattern.pdf>

Final Rule: Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (81 FR 24348):

<https://www.gpo.gov/fdsys/pkg/FR-2016-04-25/pdf/2016-09412.pdf>

Milk Substitutes in CACFP Child Care Programs (Documents/Forms section of CSDE's Special Diets in CACFP Child Care Programs webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Child-Care-Programs/Documents#MilkSubstitutes>

Requirements for Meal Modifications in CACFP Child Care Programs (CSDE Presentation):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/PresentationSpecialDietsCACFP.pdf>

Serving Milk in the CACFP (USDA):

<https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-servingmilk.pdf>

Summary of Requirements for Accommodating Special Diets for Children in the CACFP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/ChartSpecialDietsCACFP.pdf>

USDA Memo CACFP 17-2016: Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the CACFP, Q&As:

<https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-and-fluid-milk-substitutions-cacfp-qas>

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For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This handout is available at <https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/MilkSubstitutesCACFP.pdf>.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 505, Hartford, CT 06103, 860-807-2071, levy.gillespie@ct.gov.

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